

**FILED**  
**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE EASTERN DISTRICT OF VIRGINIA**  
**Alexandria Division**

2013 NOV 21 P 3:07

**JOHN VANNOY,**

**Plaintiff,**

v.

**THE FEDERAL RESERVE BANK  
OF RICHMOND,**

**Defendant.**

CLERK US DISTRICT COURT  
ALEXANDRIA, VIRGINIA

Civil Action No.

1:13CV1440  
TSE/IDP

**NOTICE OF REMOVAL OF CIVIL ACTION**

Pursuant to 12 U.S.C. § 632, the Defendant, Federal Reserve Bank of Richmond ("FRBR"), hereby invokes the jurisdiction of this Court, and states the following grounds for removal of this case from Fairfax County Circuit Court to the Alexandria Division of the United States District Court for the Eastern District of Virginia:

**REMOVAL JURISDICTION**

1. This Court has original jurisdiction over this action because it involves a civil suit to which a Federal Reserve Bank is a party. "Notwithstanding any other provision of law, all suits of a civil nature at common law or in equity to which any Federal Reserve bank shall be a party shall be deemed to arise under the laws of the United States, and the district courts of the United States shall have original jurisdiction of all such suits; and any Federal Reserve bank which is a defendant in any such suit may, at any time before the trial thereof, remove such suit from a State court into the district court of the United States for the proper district by following the procedure for the removal of causes otherwise provided by law." 12 U.S.C. § 632.

2. On or about October 24, 2012, Plaintiff John Vannoy (“Vannoy”) commenced a civil action against FRBR by filing a Complaint in Fairfax County Circuit Court, Civil Action No. CL-2012-0015979.

3. FRBR received the Complaint and accepted it as served on October 23, 2013.

4. FRBR has not served any Answer or responsive pleading to Vannoy’s Complaint, nor has it made any appearance or argument before the Fairfax County Circuit Court in this matter.

5. This Notice is filed with this Court within thirty (30) days after FRBR’s receipt as service of the Complaint upon which this action is based, and before any proceedings were had thereupon in Fairfax County Circuit Court, Virginia. This removal is timely pursuant to 12 U.S.C. § 632 and 28 U.S.C. § 1446(b).

6. In accordance with 28 U.S.C. § 1446(a), true and correct copies of all process, pleadings, documents, and orders which have been served upon FRBR are attached hereto as Exhibit A.

7. FRBR is removing this matter to the Alexandria Division of the United States District Court for the Eastern District of Virginia pursuant to 28 U.S.C. §§ 1441(a) and 1446(a). However, contemporaneously with this filing, FRBR is filing an Unopposed Motion to Transfer Venue to the Richmond Division.

8. FRBR submits this Notice of Removal without waiving any defenses to the claims asserted by Vannoy or conceding that Vannoy has pled claims upon which relief can be granted.

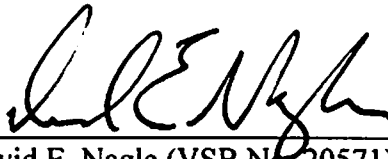
9. Contemporaneously with this filing, FRBR is also filing a Notification of Removal with the Clerk of Fairfax County Circuit Court, as required by 28 U.S.C. §1446(d). A

true and accurate copy of the Notification of Removal is attached hereto as Exhibit B. FRBR will provide written notification to Vannoy's counsel, by serving a copy on her by mail.

WHEREFORE, FRBR respectfully requests that this action be removed from Fairfax County Circuit Court to the Alexandria Division of the United States District Court for the Eastern District of Virginia.

Dated: November 21, 2013

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'David E. Nagle', is written over a horizontal line.

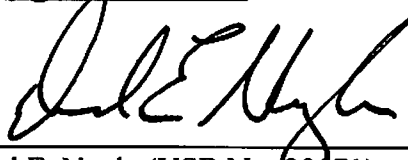
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Attorneys for Federal Reserve Bank of Richmond

**CERTIFICATE OF SERVICE**

I hereby certify that on the 21st day of November, 2013, I will arrange to have filed by hand the foregoing with the Clerk of Court, and I hereby certify that I will mail a copy of the document by U.S. mail, first-class, postage prepaid to:

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